<u>REMARKS</u>

Claims 1-55 are pending in the Application. Claims 2-5 and 18-21 are objected to. Claims 1-55 are rejected under 35 U.S.C. §102(b). Applicant respectfully traverses these rejections for at least the reasons stated below and respectfully requests that the Examiner reconsiders and withdraws these rejections.

Applicant notes that claims 2-5 and 18-21 was not amended to overcome prior art but to correct an informality—replaced numerals with alphas to avoid confusion with claim numbers. Hence, no prosecution history estoppel arises from the amendment to claims 2-5 and 18-21. *Festo Corp v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 62 U.S.P.Q.2d 1705, 1711-1712 (2002); 56 U.S.P.Q.2d 1865, 1870 (Fed. Cir. 2000). Further, the amendments made to claims 2-5 and 18-21 were not made for a substantial reason related to patentability and therefore no prosecution history estoppel arises from such amendments. *See Festo Corp.*, 62 U.S.P.Q.2d 1705 at 1707 (2002); *Warner-Jenkinson Co. v. Hilton Davis Chemical Co.*, 41 U.S.P.Q.2d 1865, 1873 (1997).

I.   <u>OBJECTIONS TO CLAIMS:</u>

The Examiner has objected to claims 2-5 and 18-21 for using numerals to designate steps instead of using alphas to designate steps. Paper No. 5, page 2. Applicant has amended claims 2-5 and 18-21, as indicated above, to use alphas instead of using numerals to designate steps to avoid confusion with claim numbers. Applicant respectfully requests the Examiner to withdraw these objections to the claims.

II.   <u>REJECTIONS UNDER 35 U.S.C. §102(b):</u>

The Examiner has rejected claims 1-55 under 35 U.S.C. §102(b) as being anticipated by Robertson et al. (U.S. Patent No. 5,598,183) (hereinafter "Robertson").

Applicant respectfully traverses these rejections for at least the reasons stated below and respectfully requests the Examiner to reconsider and withdraw these rejections.

For a claim to be anticipated under 35 U.S.C. §102, each and every claim limitation must be found within the cited prior art reference and arranged as required by the claim. M.P.E.P. §2131.

Applicant respectfully asserts that Robertson does not disclose "generating a set of motion vectors corresponding to said motion of said pointing cursor from said first source position to said first destination position" as recited in claim 1 and similarly in claims 17 and 33. The Examiner cites column 2, lines 44-56 and column 11, lines 8-51 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses and asserts that Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. This is not same as generating a set of vectors corresponding to the motion of the pointing cursor from a source position to a destination position. Instead, the correction vector causes the cursor to move toward the center point of the control whenever the cursor is within the control region. Thus, Robertson does not disclose all of the limitations of claims 1, 17 and 33, and thus Robertson does not anticipate claims 1, 17 and 33. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "storing said set of motion vectors and said first destination position referenced to said first source position" as recited in claim 1 and similarly in claims 17 and 33. The Examiner cites column 1, lines 43-57 and column 4, lines 42-67 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses and asserts that Robertson instead discloses that a current location storage unit 24 of

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the system contains the cursor control signals, i.e., X and Y coordinates, corresponding to the current location of the cursor on the display. Column 4, lines 42-45. Robertson further discloses that if the contents of the display are altered, the system determines a new location for the cursor relative to the altered display and stores the new location in the current location storage area 24. Column 4, lines 46-49. Hence, Robertson discloses storing the current location of the cursor in terms of its X and Y coordinates. This is not the same as storing vectors. Neither do the cited passages disclose storing a final destination position but instead discloses storing a current location. Furthermore, neither do the cited passages disclose storing a final destination position referenced to a source position. Thus, Robertson does not disclose all of the limitations of claims 1, 17 and 33, and thus Robertson does not anticipate claims 1, 17 and 33. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "predicting, within an application program, a destination point icon by comparing a motion vector imparted by a user to a pointing cursor to a previously acquired motion vector acquired from said user moving said pointing cursor" as recited in claim 47 and similarly in claims 50 and 53. The Examiner cites column 9, line 41 – column 10, line 5 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses and asserts that Robertson instead discloses that the system stores the current cursor position which is later compared with the current cursor position. The stored cursor position is not a vector but instead an X and Y coordinate. Hence, Robertson does not disclose comparing a motion vector imparted by a user to a pointing cursor to a previously acquired motion vector acquired from the user moving the pointing cursor. Thus, Robertson does not disclose all of the limitations of claims 47, 50 and 53, and thus Robertson does not anticipate claims 47, 50 and 53. M.P.E.P. §2131.

Claims 2-16, 18-32, 34-46, 48-49, 51-52 and 54-55 each recite combinations of features including the above combinations as recited in claims 1, 17, 33, 47, 50 and 53, respectively, and thus are not anticipated for at least the above-stated reasons.

Claims 2-16, 18-32, 34-46, 48-49, 51-52 and 54-55 recite additional features, which, in combination with the features of the claims upon which they depend, are not anticipated by Robertson.

For example, Robertson does not disclose "generating, within an application program, a first motion vector for said pointing cursor on said display as said pointing cursor moves from a second source position in response to a motion of said pointing device" as recited in claim 2 and similarly in claims 4, 18, 20, 34 and 35. The Examiner cites column 2, lines 44-56 and column 11, lines 8-51 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses As stated above, Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. This is not same as generating a motion vector for the cursor as the cursor moves from a second source position in response to a motion of a pointing device. Instead, the correction vector causes the cursor to move toward the center point of the control whenever the cursor is within the control region. Thus, Robertson does not disclose all of the limitations of claims 2, 4, 18, 20, 34 and 35, and thus Robertson does not anticipate claims 2, 4, 18, 20, 34 and 35. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "predicting a destination point icon in response to a compare of said second source position to a corresponding stored source position or a source position proximate to said second source position, wherein said corresponding stored source position which compares to said second source position also has stored said first motion vector or a motion vector proximate to said first motion vector" as recited in claim 2 and similarly in claims 4, 18, 20, 34 and 35. The Examiner cites column 9, line 41 – column 10, line 5 of

Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses and asserts that Robertson instead discloses that the system stores the current cursor position which is later compared with the current cursor position. The stored cursor position is not a vector but instead an X and Y coordinate. Hence, Robertson does not disclose a stored source position that includes a motion vector. Thus, Robertson does not disclose all of the limitations of claims 2, 4, 18, 20, 34 and 35, and thus Robertson does not anticipate claims 2, 4, 18, 20, 34 and 35. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "highlighting said destination point icon" as recited in claim 2 and similarly in claims 18, 34, 48, 51 and 54. The Examiner cites column 11, lines 8-28 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 3. Applicant respectfully traverses As stated above, Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. There is no language in the cited passage that discloses highlighting a destination point icon. Thus, Robertson does not disclose all of the limitations of claims 2, 18, 34, 48, 51 and 54, and thus Robertson does not anticipate claims 2, 18, 34, 48, 51 and 54. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "repeating said steps (a) through (c) until said highlighted destination point icon is actuated by a user of said pointing device" as recited in claim 3 and similarly in claims 5, 19, and 21. The Examiner cites column 11, lines 8-28 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses and asserts that Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity

with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. As stated above, there is no language in the cited passage that discloses highlighting a destination point icon. Neither is there any language in the cited passage that discloses performing steps (a) through (c). Neither is there any language in the cited passage that discloses repeating steps (a) through (c) until the highlighted destination point icon is actuated by a user of a pointing device. Thus, Robertson does not disclose all of the limitations of claims 3, 5, 19 and 21, and thus Robertson does not anticipate claims 3, 5, 19 and 21. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "modifying a motion of said pointing cursor to more nearly follow ideal motion vectors from said first source position to said destination point icon" as recited in claim 4 and similarly in claims 20 and 35. The Examiner cites column 8, line 67 – column 9, line 13 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses and asserts that Robertson instead discloses that that the system predicts the intended location and automatically repositions the cursor at the predicted intended location. There is no language in the cited passage that discloses modifying a motion of a pointing cursor to more nearly follow ideal motion vectors. Neither is there any language in the cited passage that discloses modifying a motion of a pointing cursor to more nearly follow ideal motion vectors from a source position to a destination point icon. Instead, Robertson simply discloses repositioning the cursor at the predicted intended location. Thus, Robertson does not disclose all of the limitations of claims 4, 20 and 35, and thus Robertson does not anticipate claims 4, 20 and 35. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said first source position is a position of a predetermined source point icon" as recited in claim

7 and similarly in claims 23 and 37. The Examiner cites column 3, lines 30-50 as disclosing the above-cited claim limitations. Paper No. 5, page 4. Applicant respectfully traverses and asserts that Robertson instead discloses positioning the cursor in a new predetermined location on the computer display each time that a window is opened or closed. There is no language in the cited passage that discloses a source position where the source position is a position of a predetermined source point icon. Instead, the cursor is positioned at a predetermined location. Thus, Robertson does not disclose all of the limitations of claims 7, 23 and 37, and thus Robertson does not anticipate claims 7, 23 and 37. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein another of said motion vectors is generated each time said motion starts from a motion stop" as recited in claim 9 and similarly in claims 25 and 39. The Examiner cites column 10, line 55 – column 11, line 8 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses and asserts that Robertson instead discloses that the system determines whether the current position of the cursor still coincides with the position of a control on the display. Robertson further discloses that if the current cursor position does coincide with the position of a control on the display, the system maintains the sensitivity values at the decreased level. Robertson further discloses that otherwise the cursor sensitivity values return to their initial values. There is no language in the cited passage that discloses generating a motion vector. Neither is there any language in the cited passage that discloses generating a motion vector each time the motion starts. Neither is there any language in the cited passage that discloses generating a motion vector each time the motion starts from a motion stop. Thus, Robertson does not disclose all of the limitations of claims 9, 25 and 39, and thus Robertson does not anticipate claims 9, 25 and 39. M.P.E.P. §2131.

Applicant respectfully assert that Robertson does not disclose "wherein said motion vector comprises parameters defining a pointing cursor average velocity, starting position, stopping position, and motion direction" as recited in claim 10 and

similarly in claims 26 and 40. The Examiner cites column 8, lines 18-50 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses and asserts that Robertson instead discloses that if the window ID is on the list of stored window IDs, then the system positions the cursor to the return location associated with the particular window ID. Robertson further discloses that otherwise, the system does not reposition the cursor. There is no language in the cited passage that discloses a motion vector. Neither is there any language in the cited passage that discloses the parameters of a motion vector. Thus, Robertson does not disclose all of the limitations of claims 10, 26 and 40, and thus Robertson does not anticipate claims 10, 26 and 40. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said set of motion vectors are stored in response to actuation said destination point icon" as recited in claim 11 and similarly in claims 27 and 41. The Examiner cites column 11, lines 8-28 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses As stated above, Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. There is no language in the cited passage that discloses a set of motion vectors. Neither is there any language in the cited passage that discloses storing a set of motion vectors in response to an actuation of a destination point icon. Thus, Robertson does not disclose all of the limitations of claims 11, 27 and 41, and thus Robertson does not anticipate claims 11, 27 and 41. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said set of motion vectors are associated with said first source position and source positions

proximate to said first source position, and said first destination position and destination positions proximate to said first destination position" as recited in claim 12 and similarly in claims 28 and 42. The Examiner cites column 6, lines 24-60 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 5. Applicant respectfully traverses and asserts that Robertson instead discloses that system alters the screen display in response to the user selection or activation of a new window. There is no language in the cited passage that discloses a set of motion vectors. Neither is there any language in the cited passage that discloses a set of motion vectors associated with a first source position and source positions proximate to the first source position. Neither is there any language in the cited passage that discloses a set of motion vectors associated with a first destination position and destination positions proximate to the first destination position. Thus, Robertson does not disclose all of the limitations of claims 12, 28 and 42, and thus Robertson does not anticipate claims 12, 28 and 42. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said second source position corresponds to a position of a source point icon" as recited in claim 13 and similarly in claims 29 and 43. The Examiner cites column 5, lines 8-55 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 5. Applicant respectfully traverses and asserts that Robertson instead discloses a list of possible cursor locations for the new screen display. There is no language in the cited passage that discloses a second source position that corresponds to a position of a source point icon. Thus, Robertson does not disclose all of the limitations of claims 13, 29 and 43, and thus Robertson does not anticipate claims 13, 29 and 43. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said pointing cursor locks to said destination point icon until said destination point icon is actuated by a user" as recited in claim 14 and similarly in claims 30 and 44. The Examiner cites column 11, lines 8-28 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses As stated

above, Robertson instead discloses that the system of Robertson adds a correction signal to the cursor control signals calculated by the CPU when the cursor is in proximity with a control. Robertson further discloses that whenever the cursor is outside of the control region, the system does not add any correction signal to the control signals. Robertson further discloses that the correction signal is generated in the form of a correction vector. Hence, Robertson discloses a correction vector that is generated when the cursor is in proximity with a control. There is no language in the cited passage that discloses locking the pointing cursor to the destination point icon until the destination point icon is actuated by a user. Thus, Robertson does not disclose all of the limitations of claims 14, 30 and 44, and thus Robertson does not anticipate claims 14, 30 and 44. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said pointing cursor locks to said destination point icon until a motion vector indicates a more likely destination point icon" as recited in claim 15 and similarly in claims 31 and 45. The Examiner cites column 5, lines 8-55 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 5. Applicant respectfully traverses and asserts that Robertson instead discloses a list of possible cursor locations for the new screen display. There is no language in the cited passage regarding a motion vector. Neither is there any language in the cited passage that discloses a pointing cursor locking to a destination point icon until a motion vector indicates a more likely destination point icon. Thus, Robertson does not disclose all of the limitations of claims 15, 31 and 45, and thus Robertson does not anticipate claims 15, 31 and 45. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "wherein said motion of said pointing cursor proceeds from said first source position to said destination point icon corresponding to an ideal motion vector, said ideal motion vector motion changed only if a new destination point icon is determined" as recited in claim 16 and similarly in claims 32 and 46. The Examiner cites column 8, line 67 – column 9, line 13 of Robertson as disclosing the above-cited claim limitation.

Paper No. 5, page 5. Applicant respectfully traverses As stated above, Robertson instead discloses that that the system predicts the intended location and automatically repositions the cursor at the predicted intended location. There is no language in the cited passage that discloses motion vectors. Neither is there any language in the cited passage that discloses that the motion of the pointing cursor proceeds from a first source position to a destination point icon corresponding to an ideal motion vector. Neither is there any language in the cited passage that discloses that the motion of the pointing cursor proceeds from a first source position to a destination point icon corresponding to an ideal motion vector, where the ideal motion vector motion is changed only if a new destination point icon is determined. Thus, Robertson does not disclose all of the limitations of claims 16, 32 and 46, and thus Robertson does not anticipate claims 16, 32 and 46. M.P.E.P. §2131.

Applicant further asserts that Robertson does not disclose "modifying a motion of said pointing cursor as a user moves a pointing device corresponding to said pointing cursor in an attempt to move said pointing cursor from a source point icon to said predicted destination point icon" as recited in claim 49 and similarly in claims 52 and 55. The Examiner cites column 8, line 67 – column 9, line 13 of Robertson as disclosing the above-cited claim limitation. Paper No. 5, page 4. Applicant respectfully traverses As stated above, Robertson instead discloses that that the system predicts the intended location and automatically repositions the cursor at the predicted intended location. There is no language in the cited passage that discloses modifying a motion of a pointing cursor as a user moves a pointing device. Neither is there any language that discloses modifying a motion of a pointing cursor as a user moves a pointing device corresponding to the pointing cursor in an attempt to move the pointing cursor from a source point icon to the predicted destination point icon. Thus, Robertson does not disclose all of the limitations of claims 49, 52 and 55, and thus Robertson does not anticipate claims 49, 52 and 55. M.P.E.P. §2131.

As a result of the foregoing, Applicant respectfully asserts that not each and every claim limitation was found within the cited prior art reference, and thus claims 1-55 are not anticipated by Robertson. M.P.E.P. §2131.
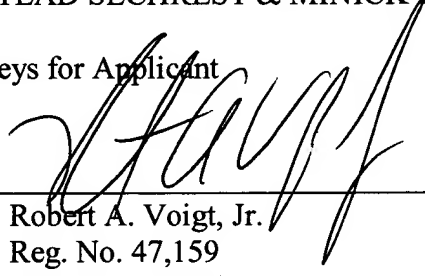
III.   <u>CONCLUSION</u>

As a result of the foregoing, it is asserted by Applicant that claims 1-55 in the Application are in condition for allowance, and Applicant respectfully requests an allowance of such claims.   Applicant respectfully requests that the Examiner call Applicant's attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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